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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division

In re:)
CARTER'S GROVE, LLC,)
Debtor,)

CARTER'S GROVE, LLC,) Bankruptcy Case No: 11-51330
Plaintiff,) Chapter 11
v.) Av. Proc. No. 11-05027-SCS
THE COLONIAL WILLIAMSBURG)
FOUNDATION,)
Defendant.)

**PLAINTIFF'S REPLY TO DEFENDANT'S
AFFIRMATIVE AND ADDITIONAL DEFENSES TO COUNTS 1, 2, 3, AND 4**

Plaintiff, CARTER'S GROVE, LLC, by and through its undersigned attorneys hereby replies to Defendants Affirmative and Additional Defenses as follows:

1. Plaintiff denies all affirmative defenses and demands strict proof thereof.
2. The Affirmative Defenses are legally insufficient affirmative defenses.

Dated: September 12, 2011

Respectfully submitted,

HIRSCHLER FLEISCHER, P.C.

By: /s/ Sheila deLa Cruz

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Attorneys for Carters Grove, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of September, 2011 a true and correct copy of the above and foregoing document was filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all registered users in this case. I further certify that I have sent a copy of the foregoing by First Class Mail to:

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/s/ Sheila deLa Cruz

Counsel